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April 24, 2018

**VIA HAND DELIVERY**

**Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554  
Attn: Audio Division, Media Bureau**

**Re: WCMX(AM), Leominster, MA (Facility ID No. 54850)  
Request for Waiver of Online Public File Requirement**

Dear Ms. Dortch:

Twin City Baptist Temple, Inc. ("Twin City Baptist"), licensee of the above-referenced AM broadcast station (the "Station"), hereby requests a sixty-day waiver of the requirement to maintain online public inspection files on the FCC's website for the Station.

Under certain circumstances, the Commission will waive the online public inspection file requirement for licensees. In the 2016 Report and Order which expanded the online public inspection file requirement to *intra alia* broadcast radio licensees, the Commission stated:

If an entity believes that the transition to the online file will impose an undue hardship, it may seek a waiver of the requirements adopted in this order. An entity seeking a waiver should provide the Commission with information documenting the economic hardship the station would incur in complying with online file requirements, its technical inability to do so, or such other reasons as would warrant waiver under our general waiver standards . . . The Commission also will be favorably inclined to grant requests for additional time to commence online filing from very small radio stations with fewer than five full-time employees, as these stations may have limited resources and, therefore, find the transition to the online file particularly challenging.<sup>1</sup>

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<sup>1</sup> *Expansion of Online Public File Obligations to Cable and Satellite TV Operators and Broadcast and Satellite Radio Licensees*, Report and Order, 31 FCC Rcd. 526, 544, ¶ 44 (2016).

Twin City Baptist qualifies under this standard. The Station has fewer than five employees, and Twin City Baptist has limited financial, technical, and human resources to expend in managing the Station. In addition, Twin City Baptist has been operating the Station without the assistance of communications counsel. For these reasons, compliance with the online public inspection file requirement is particularly challenging to smaller broadcasters such as Twin City Baptist. Accordingly, compliance with the online public inspection file requirement would subject Twin City Baptist to undue economic hardship at this time.

Furthermore, Twin City Baptist's resources have been particularly limited in recent months, as the Station's facilities experienced severe water damage due to roof leakage, requiring extensive repairs to the studio and equipment.<sup>2</sup> As a result of these circumstances, Twin City Baptist has not been able to devote the necessary time to complete the online public inspection file requirement for the Station. The Station is off the air, and licensee has been devoting all of its time and resources to returning the Station back on the air.

For these reasons, Twin City Baptist requests a sixty-day waiver of the online public inspection file requirement for the Station to provide it with sufficient time to complete the Station's files.

Respectfully submitted,

Matthew H. McCormick  
Mark C. DeSantis  
*Counsel to Twin City Baptist Temple, Inc.*

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<sup>2</sup> See *Request for Silent Special Temporary Authority*, File No. BLSTA-20180418AEV.